

Attachment A - NO_x RACT Plan - Amendment 2

1. Recast Energy Louisville, LLC (Recast) has achieved a significant NO_x emissions reduction without the installation of additional controls through the use of alternate fuels that result in lower NO_x emissions. No. 4 Boiler has been converted from combusting coal to combusting wood residue/biomass, and No. 5, No. 8, No. 9 and No.10 Boilers will each only combust natural gas. (No. 5 Boiler previously was permitted to burn fuel oil as a back-up fuel.)
2. The oxides of nitrogen (NO_x, expressed as NO₂) emissions from No. 4 Boiler shall not exceed 0.50 pound per million Btu of heat input.
3. The oxides of nitrogen (NO_x, expressed as NO₂) emissions from No. 5, No. 8, No. 9 and No. 10 Boilers shall not exceed 0.20 pound per million Btu of heat input per each Boiler.
4. Recast shall conduct a biennial performance test for NO_x on each Boiler; No. 4, No. 5, No. 8, No. 9 and No. 10. If Boilers No. 8, No. 9 and No. 10 are identical, Recast may conduct a biennial performance test for NO_x on only one of these three boilers as long as the make, model and heat input are the same. The requirements of Section 5.1 of APCD Regulation 6.42, *Reasonably Available Control Technology Requirements for Major Volatile Organic Compound- and Nitrogen Oxides- Emitting Facilities*, have been met by Recast, and subject to the annual performance test schedule reinstitution provision, performance testing may be done on a biennial schedule. Performance testing shall meet the following requirements:
 - A. Emissions concentrations and the mass determinations shall be obtained using Reference Method of Appendix A to 40 CFR Part 60. The following methods shall be used:
 - 1) Method 1 or 1A, which furnishes guidance in site and traverse selection for sampling velocity at traverse points in stationary sources;
 - 2) Method 2, 2A, 2B, 2C, 2D, 2E, 2F, 2G or 2H, which applies to measurements of gas volumetric flow rates;
 - 3) Method 3, 3A, 3B or 3C, which is applicable for determining the concentrations of one or more of the following gases: carbon dioxide, O₂, CO, nitrogen and methane;
 - 4) Method 4, which determines the moisture content in stack gases; and
 - 5) Method 7, 7A, 7B, 7C, 7D or 7E, which provides the analytical method for determining the concentration of NO_x emissions from stationary sources.
 - B. The use of other Reference Methods that are added to 40 CFR Part 60 Appendix A, alternative tests or modifications to the Reference Methods listed in NO_x RACT Plan Element (Element) No. 4.A. may be proposed by Recast as part of the testing plan required by Element No. 4.D. Such methods may be used if approved in writing by the District.

- C. Performance testing shall meet the requirements of APCD Regulation 1.04, *Performance Tests*, that are not addressed in this Element.
 - D. A notification of intent to conduct a performance test shall be submitted to the District at least 25 working days in advance of the projected starting date for the performance test. The notification shall include the proposed test methods to be used.
 - E. If a pre-test conference to discuss the proposed test methods is deemed necessary by the District, a pre-test conference shall be arranged by District personnel.
 - F. At least 10 working days' prior notice of the scheduled starting date for the performance test shall be provided to the District.
 - G. A performance test report shall be submitted to the District within 60 days of the actual date of completion of performance testing. The report shall include the calculations used to determine emissions. The NO_x emission rate shall be expressed in both pounds per hour and pounds per million Btu formats. The raw data shall be retained by Recast for a minimum of 5 years and made available to the District upon request. Selected portions of the raw data used to calculate the emissions shall be included in the report in a format provided by the District.
5. Recast shall comply with the biennial tune-up requirements for No. 4 Boiler in 40 CFR Part 63 Subpart JJJJJ (Area Sources) beginning with the first compliance date of March 21, 2014. (Note, No. 5, No. 8, No. 9 and No. 10 Boilers are not subject to 40 CFR Part 63 Subpart JJJJJ.)
6. Recast shall keep a record identifying all deviations from the requirements of this NO_x RACT Plan and shall submit to the District a written report of all deviations that occurred during the preceding semiannual period. Semiannual periods shall run from January 1 to June 30, and from July 1 to December 31. The report shall contain the following information:
- A. The boiler number;
 - B. The beginning and ending date of the reporting period;
 - C. Identification of all periods during which a deviation occurred;
 - D. A description, including the magnitude, of the deviation;
 - E. If known, the cause of the deviation; and
 - F. A description of all corrective actions taken to abate the deviation.

If no deviation occurred during the semiannual period, the report shall contain a negative declaration. Each report shall be submitted within 60 days following the end of the semiannual period.

7. In lieu of the requirements in the NO_x RACT Plan, Recast may comply with alternative requirements regarding emission limitations, equipment operation, test methods, monitoring and record keeping, or reporting, provided the following conditions are met.
- A. The alternative requirements are established and incorporated into an operating permit pursuant to a Title V Operating Permit issuance, renewal, or significant permit revision process as established in Regulation 2.16, *Title V Operating Permits*;
 - B. The alternative requirements are consistent with the streamlining procedures and guidelines set forth in Section II.A. of *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, March 5, 1996, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards. The overall effect of compliance with alternative requirements shall consider the effect on an intrinsic basis, such as pounds per million Btu;
 - C. The U.S. Environmental Protection Agency (EPA) has not objected to the issuance, renewal or revision of the Title V Operation Permit; and either
 - D. If the public comment period preceded the EPA review period, then the District had transmitted any public comments concerning the alternative requirements to EPA with the proposed permit; or
 - E. If the EPA and public comment periods ran concurrently, then the District had transmitted any public comments concerning the alternative requirements to EPA no later than 5 working days after the end of the public comment period.

The District's determination of approval of any alternative requirements is not binding on EPA. Non-compliance with any alternative requirement established pursuant to the Title V Operating Permit process constitutes a violation of this NO_x RACT Plan.